
BUCKNER + MILES

December 8, 2015

Via ECF and Facsimile

Honorable Laura Taylor Swain
United States District Judge
USDC, Southern District of New York
500 Pearl Street, Courtroom 12D
New York City, New York 10007

Re: John Doe v. Ejercito de Liberacion Nacional, et al., No. 15-cv-08652-LTS

Dear Judge Swain:

As counsel for Petitioner/Judgment Creditor John Doe in the above proceeding, we respectfully request a brief extension of time, from today to December 10, 2015, to file the Pre-Conference Statement pursuant to the Initial Conference Order [DE 49]. All parties consent to and join in this extension request.

There are five separate parties working on the joint statement, and substantial good faith disputes have so far prevented the parties from completing the statement despite their diligent efforts. The parties believe that an extra two days will enable them to resolve their disputes and finalize the statement.

As noted, we have conferred with counsel of record, and all parties join in the relief requested in this letter.

We thank you for consideration of this matter.

Sincerely,



Brett E. von Borke

BEvB/ae

Cc: All counsel of record (by ECF)